1 2 3 4 5 6	Nanci L. Clarence (SBN 122286) Joshua A. Cohen (SBN 217853) CLARENCE DYER & COHEN LLP 899 Ellis Street San Francisco, California 94109 Tel: (415) 749-1800 Fax: (415) 749-1694 nclarence@clarencedyer.com Attorneys for Defendant		
7	RAGINI VECHAM		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN JOSE DIVISION		
11	UNITED STATES OF AMERICA,	CASE NO. CR-15-0427 BLF	
12	Plaintiff,	STIPULATION AND [PROPOSED]	
13	v.	ORDER REGARDING TRAVEL TO RENO, NEVADA	
14	RAGINI VECHAM,		
15	Defendant.		
16			
17			
18			
19	request for an order permitting Ms. Vecham to travel to Reno, Nevada on November 23, 2015, returning November 29, 2015. Ms. Vecham is currently being supervised by the United States		
20	Pretrial Services Agency by Kim Do of the Northern District of California, as Ms Vecham resides		
21	in Cupertino.		
22	Ms. Vecham would like to visit her family for the Thanksgiving holiday. Ms. Vecham		
23	respectfully requests the court permit the Pretrial Services Agency to approve Ms. Vecham's		
24	travel.		
25			
26	Assistant United States Attorney Tim Lucey. All have stated that they do not oppose this trip.		
27	Officer Do, as the Pretrial Services Officer for this district, and AUSA Lucey have agreed by stipulation.		
28	Supuration.		

-1- Case No. CR-15-0427 BLF STIPULATION AND [PROPOSED] ORDER REGARDING TRAVEL TO RENO, NEVADA

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1		
1	PURSUANT TO STIPULATION, IT IS SO ORDERED	
2 3	Date: November, 2015	
4	Honorable Beth Freeman	
5	United States District Judge	
6	Approved as to form:	
7		
8	By: /s/: Nanci L. Clarence Nanci L. Clarence	
9	CLARENCE DYER & COHEN LLP Counsel for Defendant Ragini Vecham	
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11		
12	By: /s/: Tim Lucey	
13	Tim Lucey Assistant United States Attorney	
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28	2 Case No. CR-10-0642 CRB STIPULATION AND [PROPOSED] ORDER REGARDING TRAVEL TO RENO, NEVADA	
25 26 27 28	2 Case No. CR-10-0642 O STIPULATION AND [PROPOSED] ORDER REGARDING TRAVEL TO RENO, NEVA	